

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

ROBERT T. ROMANS,)
Plaintiff,)
)
v.) CIVIL ACTION NO. 04-10344-NMG
)
THE UNITED STATES)
OF AMERICA,)
Defendant.)
)

**ASSENTED-TO MOTION OF PLAINTIFF ROBERT T. ROMANS
FOR EXTENSION OF TIME TO CONSUMMATE SETTLEMENT
TO OCTOBER 16, 2006**

Plaintiff Robert T. Romans hereby moves to extend the time for consummation of the parties' settlement to October 16, 1006. As reasons therefor, plaintiff's counsel states the following:

1. On August 2, 2006, the Court issued a 45-day Settlement Order of Dismissal. On August 9, 2006, plaintiff's counsel forwarded to plaintiff by mail the proposed Settlement Agreement for execution.

2. During the week of August 22, 2006, counsel left a telephone message for plaintiff to remind him that counsel are awaiting the return of the executed agreement. This message was followed up with a letter to plaintiff on September 1, 2006.

3. On September 7, 2006, plaintiff's counsel again wrote to plaintiff regarding the approaching deadline for consummating settlement per the Court's order of August 2, 2006.

4. As of the date hereof, plaintiff's counsel has not received back the signed Settlement Agreement, has not been contacted by plaintiff, and plaintiff has not responded to any of counsel's telephone messages.

5. Plaintiff's counsel seeks an additional 30 days to establish contact with plaintiff and consummate settlement. The effective date of the Court's Settlement Order of Dismissal would then be October 16, 2006.

6. Defendant's counsel, AUSA Mark J. Grady, has given his assent to this motion.

ROBERT T. ROMANS,
By his attorneys,

DiMENTO & SULLIVAN

Dated: September 14, 2006

/s/ Francis J. DiMento, Jr.
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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on September 14, 2006.

/s/ Jason A. Kosow